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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

ESSA-AISHA A PURNELL
ABDOU R GUEYE

Chapter 13

Debtor

Bankruptcy No. 19-12644-MDC

**OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTOR(S)**

AND NOW comes, WILLIAM C. MILLER, ESQUIRE, chapter 13 standing trustee, to object to confirmation of the chapter 13 plan of debtor(s), because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or debtor(s) has/have failed to provide information, evidence, or corrections to the petition, schedules, statements or other documents filed by debtor(s) to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan fails to provide that all of the projected disposable income of debtor(s), who has/have current monthly income which is above median, will be applied to make payments to unsecured creditors under the Plan, in violation of 11 U.S.C. Section 1325 (b)(3).

Debtor(s) has/have failed to file an accurate statement of current monthly income, and/or if the debtor(s) has/have above-median income, an accurate calculation of disposable income in accordance with Section 1325 (b)(3), on Official Form 22C, as required by Bankruptcy Rule 1007(b)(6).

The Plan does not provide for the submission of all or such portion of future earnings or other future income of the debtor(s) to the supervision and control of the standing trustee as is necessary to fund the Plan, in violation of 11 U.S.C. Sections 1322 (a)(1).

Debtor(s) has/have failed to file amended schedules as directed at the meeting of creditors held under 11 U.S.C. Section 341(a).

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ William C. Miller
William C. Miller, Esquire
Chapter 13 Standing Trustee